



Re: Fw: PCB Cleanup at 100 California Street  
Ivan Lieben to: Steve Armann  
Cc: Arlene Kabei, Carmen Santos

06/23/2009 10:50 AM

Steve:

FOIA (b)(5) and attorney-client

Ivan Lieben, Assistant Regional Counsel  
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and/or protected by the attorney/client or other privileges.

Steve Armann

Arlene and Ivan, heads-up/FYI... Carmen is wo...

06/18/2009 01:07:39 PM

From: Steve Armann/R9/USEPA/US  
To: Arlene Kabei/R9/USEPA/US@EPA, Ivan Lieben/R9/USEPA/US@EPA  
Cc: Carmen Santos/R9/USEPA/US@EPA  
Date: 06/18/2009 01:07 PM  
Subject: Fw: PCB Cleanup at 100 California Street

FOIA (b)(5) and attorney-client

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Steven S. Armann, Manager  
RCRA Corrective Action Office  
75 Hawthorne Street  
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Phone: 415-972-3352  
Fax: 415-947-3533

----- Forwarded by Steve Armann/R9/USEPA/US on 06/18/2009 12:55 PM -----

From: Carmen Santos/R9/USEPA/US  
To: bfalcone@environova.com  
Cc: armann.steve@epa.gov, wilson.patrick@epa.gov  
Date: 06/18/2009 12:50 PM  
Subject: RE: PCB Cleanup at 100 California Street

Greetings, Basil:

Thank you for your message. Below are clarifications on the issues that you raised. Please refer to 40 CFR 761.3 (definitions), 761.61(a) (self implementing cleanup plan for PCB remediation waste, cleanup plan requirements at 761.61(a)(2) through (a)(3)), 761 Subparts N (characterization) and O (cleanup verification), 761.79(h) (alternative decontamination and sampling procedures), 761 Subpart G, and 761.62 (bulk product waste) to get familiar with the requirements applicable to the caulking removal, sampling, cleanup/decontamination for 100 California Street in San Francisco. I also want to reiterate that for the 100 California building we recommended the cleanup plan be submitted under 761.61(c).

Clarifications on issues raised in your June 18 message:

Standard wipe test: This test is described in the TSCA regulations at 40 CFR 761. I do not have the PCB regulations at home. A quick reference to this test is found in 761.3 (definitions) under *Standard Wipe Test* and in Subpart G of the TSCA regulations. The results are reported in ug/100 square cm (ug/sq.cm). Also, the wipe must contain certain solvents (e.g., hexane) to do the surface sampling. The standard wipe test has nothing to do with wipe sampling procedures under SW-846. There is a section in the TSCA regulations that indicates how to convert the standard wipe test result to a quantity (ug or mg) or a concentration. You may also consult with the laboratory that you will be using for analysis on the proper conversion factors and/or procedures to convert ug/100 sq.cm to a concentration (e.g., mg/Kg or ppm) or to a quantity (e.g., ug or mg). I recommend using a laboratory that is familiar with laboratory analytical methods used for TSCA cleanups and investigation. For such methods, please refer to 40 CFR 761 Subparts N, O, and G.

Substrates (e.g., wood, concrete, backer board): Where the caulk has been in contact with porous

Granite - polished, shiny, smooth surface: This kind of granite is considered non-porous under the definition of non-porous in 761.3. Standard wipe sample test can be used on this surface. Actual sample of granite not needed if it is non-porous.

**Caulk removal - Is a cleanup plan necessary if wipe samples show PCBs not detected?** A plan laying out the cleanup, sampling, and decontamination procedures as well as the pilot testing is necessary. The owner of the building still needs to submit a plan to EPA for approval. Surface decontamination will need to be carried throughout the entire areas that are in contact with caulk. Cleanup wastes and decontamination fluids will need to be disposed of appropriately. Wipe sampling procedures for decorative stone surfaces need to be included in the plan. Soils surrounding the building need to be sampled and if PCBs are above 1 ppm, excavation and disposal of PCB contaminated soils would need to be addressed in the plan. I understood that the owner wants to follow the 761.61(a) requirements using a cleanup level equal to or less than 1 ppm. In addition, some decontamination procedures to be used in this case may need to be proposed under 761.79(h) for EPA approval if such decontamination procedure(s) is not contained or referenced in 761.61(a). We may consider doing that approval in conjunction with the approval of the 761.61(a) cleanup plan.

Building interior: Your June 18, 2009 (09:52AM) clarified the building was constructed in 1960. PCB caulk was found in the building exterior. The interior of the building should also be investigated for PCB-containing caulk. The cleanup plan should discuss this issue and how the owner intends to evaluate the interior of the building for PCBs. Please be aware that if PCB-containing caulk is present in the interior of the building, the use of the PCB-containing caulk constitutes an unauthorized use under TSCA. Building materials containing PCBs due to migration of PCBs from PCB sources within the building would be considered an unauthorized disposal of PCBs if not cleaned up to an EPA approved cleanup level.

If you have questions concerning this message, please call me at 415.972.3360 next week and/or send an e-mail message. I will reply as soon as I can; and hope to be back in the office the week of June 21. Thank you.

Sincerely,  
Carmen

Carmen D. Santos, Project Manager  
RCRA Corrective Action Office  
Waste Management Division  
USEPA Region 9  
415.972.3360  
fax: 415.947.3533

-----"Basil Falcone" <balfalcone@environova.com> wrote: -----

To: Carmen Santos/R9/USEPA/US@EPA  
From: "Basil Falcone" <balfalcone@environova.com>  
Date: 06/18/2009 09:52AM  
cc: Steve Armann/R9/USEPA/US@EPA, Patrick Wilson/R9/USEPA/US@EPA  
Subject: RE: PCB Cleanup at 100 California Street

Carmen,

The commercial office building was built in 1960 and is occupied. The other items I will confirm and get back to you.

I do need some direction on the wipe sampling. In speaking with the lab the wipe samples are reported in  $\mu\text{g}$ /per wipe (micrograms /per wipe) and not ppm or ppb. The regulation states that the values need to be compared to ppm concentrations. What do you suggest? The lab told me that the SW-846 protocol calls for 10 square centimeters of surfaced wiped.

Also if by some miracle the wipe samples come up none detected would the building and contractor simply be able to use 761.62 and just call it a removal action?

We really appreciate your help with this project and look forward to a successful outcome.

Thank you

Basil Falcone, REA, CAC

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**From:** Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

**Sent:** Wednesday, June 17, 2009 6:13 PM

**To:** Basil Falcone

**Cc:** armann.steve@epa.gov; wilson.patrick@epa.gov

**Subject:** PCB Cleanup at 100 California Street

Greetings, Basil:

This message is a follow up to the conference call that we had on June 17. We appreciate the conference call with all parties involved with the building at 100 California Street and apologize not been able to attend the meeting in person due to illness .

Regarding the outside of the building, an additional issue is soils. Are there any exposed soils within 3 feet from the building? If so, those soils should be tested for PCBs. I also wanted to address the issues of windows: window frames can be cleaned with an appropriate solvent such as mineral spirits and scrubbed with detergent/water mixture. Standard wipe test can be used to determine level of PCBs on window frames. Are the owners planning to keep the windows currently in place at the building or is the plan to replace them as part of the renovation?

I understood the building was constructed in 1970. Outside caulking contains PCBs. The caulking inside the building should be tested to determine if PCBs are also present. We would appreciate your confirmation as to whether the building is currently occupied.

Please call me if you have any questions concerning cleanup plans under 40 CFR 761.61(a) or 40 CFR 761.61(c). Thank you.

Sincerely,

Carmen

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